

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Agency Interest No. 1409
Activity No.: PER20080038

Mr. Mike Christal
The Dow Chemical Company – Louisiana Operations
Post Office Box 150
Plaquemine, Louisiana 70765

RE: Part 70 operating permit modification, Chlorine/Cell Service Plant, The Dow Chemical Company – Louisiana Operations, Plaquemine, Iberville Parish, Louisiana

Dear Mr. Christal:

This is to inform you that the permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 21st of May, 2012, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and Agency Interest No. cited above should be referenced in future correspondence regarding this facility.

Done this _____ day of _____, 2009.

Permit No.: 2573-V5

Sincerely,

Cheryl Sonnier-Nolan
Assistant Secretary
CSN/TVN
cc: EPA Region 6

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
THE DOW CHEMICAL COMPANY – LOUISIANA OPERATIONS
CHLORINE/CELL SERVICE PLANT
PROPOSED PART 70 AIR OPERATING PERMIT MODIFICATION

The LDEQ, Office of Environmental Services, is accepting written comments on the proposed Part 70 air operating permit modification for The Dow Chemical Company – Louisiana Operations, Post Office Box 150, Plaquemine, Louisiana 70765 for the Chlorine / Cell Service Plant. **The facility is located at 21255 Highway 1, Plaquemine, Iberville Parish.**

This Notice is being published under LAC 33:III.5107.D public notice requirements only. This proposed permit does not require to be reviewed by EPA.

The Dow Chemical Company – Louisiana Operations requested a Part 70 operating permit modification for the plants to reconcile the calculations for cap source GRP082. GRP082 is comprised of the brine mix tanks MT-1A/B and brine storage tanks CL-13 A/B, T-4 A/B, T-117 and T-400. Emissions of 1,2-Dichloroethane and Chloroform increase in this permit modification are more than the Minimum Emission Rates (MERs).

Permitted emissions from the plants in tons per year are as follows:

Pollutant	Permitted	Proposed	Change
PM ₁₀	14.93	14.93	-
SO ₂	0.16	0.16	-
CO	2.07	2.03	-0.04
VOC*	8.47	15.48	+7.01
Ammonia	0.01	0.01	-
Chlorine	4.82	4.82	-
Dichloromethane	1.99	2.20	+0.21
Hydrochloric acid	0.56	0.48	-0.08
Nitric acid	0.01	0.01	-
Sulfuric acid	0.11	0.11	-

VOC* LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Permitted	Proposed	Change
1,2-Dichloroethane	0.038	0.152	+0.114
1,2-Dichloropropane	<0.01	<0.01	-
Benzene	1.40	1.42	+0.02
Bromoform	0.10	4.67	+4.57

Carbon tetrachloride	1.62	1.60	-0.02
Chlorobenzene	0.012	0.008	-0.004
Chloroethane	0.02	-	-0.02
Chloroform	4.43	4.82	+0.39
Dichlobenzene	<0.01	<0.01	-
Dichlorobromomethane	0.17	2.02	+1.85
Diethanolamine	<0.01	<0.01	-
Ethyl benzene	<0.01	0.04	+0.04
Hexachlorobenzene	<0.01	<0.01	-
Methyl Chloride	0.24	0.27	+0.03
Tetrachloroethylene	0.05	0.07	+0.02
Toluene	0.10	0.29	+0.19
Vinyl chloride	<0.01	<0.01	-
Xylene	0.09	0.10	+0.01
Total VOC TAPs	8.27	15.46	+7.19
Total Non-Tap VOCs	0.20	0.02	-0.18

This permit was processed as an expedited permit in accordance with LAC 33:I.Chapter 18.

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the "Worksheet for Technical Review of Working Draft of Proposed Permit". All remarks received by LDEQ are included in the record that is available for public review.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Thursday, March 19, 2009.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit application, the proposed permit, and the statement of basis are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at **Iberville Parish Library, Headquarters, 24605 J. Gerald Berret Blvd., Plaquemine, LA 70764 and the West Baton Rouge Parish Library – Headquarters located at 830 North Alexander, Port Allen LA 70767.**

Inquiries or requests for additional information regarding this permit action should be directed to Tuongvan, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3054.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmailistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the proposed permit and statement of basis can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 1409, Permit Number 2573-V5, and Activity Number PER20080038.

Scheduled Publication Date: Thursday, February 12, 2009

**AIR PERMIT BRIEFING SHEET
OFFICE OF ENVIRONMENTAL SERVICES
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**CHLORINE/CELL SERVICE PLANT
AGENCY INTEREST NO. 1409
THE DOW CHEMICAL COMPANY – LOUISIANA OPERATIONS
PLAQUEMINE, IBERVILLE PARISH, LOUISIANA**

I. Background

The Dow Chemical Company (Dow) owns and operates the Chlorine/Cell Service Plant at its Louisiana Operations near Plaquemine, Iberville Parish. Currently the facility operates under Part 70 Operating Permit 2573-V4, dated May 21, 2007 and the Administrative Amendment dated September 27, 2007.

II. Origin

A permit application dated October 16, 2008 was submitted requesting a Part 70 operating permit modification.

III. Description

Brine from brine wells is purified at the Chlorine Plant before being electrolyzed in diaphragm cells to produce hydrogen, chlorine, and caustic soda. Diluted caustic soda solution is collected, used in the chlorine process, or pumped directly to the Caustic Plant for further processing. Hydrogen is compressed, purified, delivered via pipeline to Dow's electrical power generating system or sold. The wet gaseous chlorine is dried, compressed, purified, liquefied, and sent to storage tanks. The liquid chlorine is transported off-site via rail cars or gasified for internal chlorine users.

Dow requested a Part 70 operating permit modification to reconcile the calculations for cap source GRP082. GRP082 is comprised of the brine mix tanks MT-1A/B and brine storage tanks CL-13 A/B, T-4 A/B, T-117 and T-400.

Permitted emissions from the plants in tons per year are as follows:

Pollutant	Permitted	Proposed	Change
PM ₁₀	14.93	14.93	-
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VOC* LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Permitted	Proposed	Change
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1,2-Dichloropropane	<0.01	<0.01	-
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Chlorobenzene	0.012	0.008	-0.004
Chloroethane	0.02	-	-0.02
Chloroform	4.43	4.82	+0.39
Dichlobenzene	<0.01	<0.01	-
Dichlorobromomethane	0.17	2.02	+1.85
Diethanolamine	<0.01	<0.01	-
Ethyl benzene	<0.01	0.04	+0.04
Hexachlorobenzene	<0.01	<0.01	-
Methyl Chloride	0.24	0.27	+0.03
Tetrachloroethylene	0.05	0.07	+0.02
Toluene	0.10	0.29	+0.19
Vinyl chloride	<0.01	<0.01	-
Xylene	0.09	0.10	+0.01
Total VOC TAPs	8.27	15.46	+7.19
Total Non-Tap VOCs	0.20	0.02	-0.18

IV. Type of Review

This application was reviewed for compliance with the Louisiana Part 70 operating permit program, Louisiana Air Quality Regulations and NESHAP. NSPS and PSD do not apply. The facility is a part of a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. Emissions of 1,2-Dichloroethane and Chloroform increase in this permit modification are more than the Minimum Emission Rates (MERs).

**AIR PERMIT BRIEFING SHEET
OFFICE OF ENVIRONMENTAL SERVICES
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**CHLORINE/CELL SERVICE PLANT
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THE DOW CHEMICAL COMPANY - LOUISIANA OPERATIONS
PLAQUEMINE, IBERVILLE PARISH, LOUISIANA**

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

This permit modification required public notice per LAC 33: III.5107.1.D. A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Dispersion Model(s) Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Ambient Air Quality Standard (NAAQS)

LDEQ has done the chloroform screening for this facility. The screened modeled concentration is 4.16 ug/m³, below the AAS of 4.30 ug/m³.

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PLAQUEMINE, IBERVILLE PARISH, LOUISIANA**

VIII. General Condition XVII Activities

ID No.:	Description	Schedule	VOC(TPY)
-	FRP Work Emissions	Weekly	0.02

IX. Insignificant Activities - LAC 33:III.501.B.5

ID No.:	Description	Citation
IA-1	MRUs at Caustic Plant	LAC 33:III.501.B.5
IA-2	Portable Boilers at Chlorine	LAC 33:III.501.B.5

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**CHLORINE/CELL SERVICE PLANT
AGENCY INTEREST NO. 1409
THE DOW CHEMICAL COMPANY - LOUISIANA OPERATIONS
PLAQUEMINE, IBERVILLE PARISH, LOUISIANA**

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.						LAC 33:III.Chapter									
		2103	2107	2111	2115	2121	2122	2131	2153	5▲	9	11	13	15	51*	56	59
EQT619	1O - Chlorine Carbonate Tower				2												1
EQT620	2O - Sludge Acidification Unit T-10																1
EQT621	3O - B-Train Cell Header Drain																1
EQT622	CF - Equipment Opening Losses																1
EQT623	R0 - Cooling Water Tower CT-701																1
EQT624	U9 - Chlorine Plant Scrubber AT-200A																1
EQT625	UA - Chlorine Plant Scrubber AT-200B																1
EQT626	UB - Hydrogen Stack HS-1W																1
EQT627	UC - Hydrogen Stack HS-1E																1
EQT628	UD - Hydrogen Stack HS-2W																1
EQT629	UE - Hydrogen Stack HS-2E																1
EQT630	UF - Hydrogen Stack HS-3W																1
EQT631	UG - Hydrogen Stack HS-3E																1
EQT632	UH - Hydrogen Stack HS-4W																1
EQT633	UI - Hydrogen Stack HS-4E																1
EQT634	UJ - Hydrogen Stack HS-5W																1
EQT635	UK - Hydrogen Stack HS-5E																1
EQT636	UL - Hydrogen Stack T-704A																1
EQT637	UM - Hydrogen Stack T-704B																1
EQT638	UN - Hydrogen Stack T-99W																1
EQT639	UO - Hydrogen Stack T-99E																1

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**CHLORINE/CELL SERVICE PLANT
AGENCY INTEREST NO. 1409
THE DOW CHEMICAL COMPANY - LOUISIANA OPERATIONS
PLAQUEMINES, IBERVILLE PARISH, LOUISIANA**

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III						LAC 33:III Chapter									
		2103	2107	2111	2115	2121	2122	2131	2153	5▲	9	11	13	15	51*	56	59
EQT640	UP - Carbonate Storage Tank T-18																
EQT641	UQ - HCl Storage T-29																
EQT642	UR - HCl Storage T-24																
EQT643	US - H ₂ SO ₄ Storage T-25																
EQT644	UT - Bisulfite Tank T-900																
EQT645	UWA - Mix Tank MT-1A																
EQT646	UWB - Mix Tank MT-1B																
EQT647	UX - Lab Vents																
EQT648	UY - Block Analyzers																
EQT649	V0 - Crushed Cell Frames and Covers																
EQT650	V1A - Brine Storage Tank CL-13A																
EQT651	V1B - Brine Storage Tank CL-13B																
EQT652	V1C - Brine Storage Tank T-4A																
EQT653	V1D - Brine Storage Tank T-4B																
EQT654	V1E - Brine Storage Tank T-117																
EQT655	V1F - Brine Storage Tank T-400A																
EQT656	V1G - Brine Storage Tank T-400B																
EQT657	V2A - Cell Header VSP-1																
EQT658	V2B - Cell Header VSP-2																
EQT659	V3A - Seal pot SP-20A																
EQT660	V3B - Seal pot SP-20B																

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.						LAC 33:III Chapter									
		2103	2107	2111	2115	2121	2122	2131	2133	5▲	9	11	13	15	51*	56	59
EQT661	WJA - Wastewater Storage T-1A																
EQT662	WJB - Wastewater Storage T-1B																
EQT705	Scrubber Knock-Out Pot D-201																
EQT706	Loading Rack Area																
EQT707	Scrubber Knock-Out Pot D-200A																
EQT708	Scrubber Knock-Out Pot D-200B																
EQT709	A-Train Cooling, Drying, and Compression Area																
EQT710	A-Train Liquefaction Area																
EQT711	B-Train Liquefaction Area																
EQT712	A-Train Purification Area																
EQT713	B-Train Purification Area																
EQT714	Rectifier Area																
EQT715	Storage Area																
EQT716	Tail Gas Vents																
EQT717	Chlorine User Lines																
FUG015	UZ - Fugitive Emissions																
UNFO06	Chlorine/Cell Service Plant																

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**CHLORINE/CELL SERVICE PLANT
AGENCY INTEREST NO. 1409
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PLAQUEMINES, IBERVILLE PARISH, LOUISIANA**

X. Applicable Louisiana and Federal Air Quality Requirements

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**CHLORINE/CELL SERVICE PLANT****AGENCY INTEREST NO. 1409****THE DOW CHEMICAL COMPANY - LOUISIANA OPERATIONS
PLAQUEMINES, IBERVILLE PARISH, LOUISIANA****X. Applicable Louisiana and Federal Air Quality Requirements**

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR		
		A	Db	Kb	VV	DDD	RRR	A	J	V	Y	FF	A	F	G	H	Q	64	68	72		
EQT641	UQ - HCl Storage T-29																					
EQT642	UR - HCl Storage T-24																					
EQT643	US - H ₂ SO ₄ Storage T-25																					
EQT644	UT - Bisulfite Tank T-900																					
EQT645	UWA - Mix Tank MT-1A																					
EQT646	UWB - Mix Tank MT-1B																					
EQT647	UX - Lab Vents																					
EQT648	UY - Block Analyzers																					
EQT649	V0 - Crushed Cell Frames and Covers																					
EQT650	V1A - Brine Storage Tank CL-13A																					
EQT651	V1B - Brine Storage Tank CL-13B																					
EQT652	V1C - Brine Storage Tank T-4A																					
EQT653	V1D - Brine Storage Tank T-4B																					
EQT654	V1E - Brine Storage Tank T-117																					
EQT655	V1F - Brine Storage Tank T-400A																					
EQT656	V1G - Brine Storage Tank T-400B																					
EQT657..	V2A - Cell Header VSP-1																					
EQT658	V2B - Cell Header VSP-2																					
EQT659	V3A - Seal pot SP-20A																					
EQT660	V3B - Seal pot SP-20B																					
EQT661	WJA - Wastewater Storage T-1A																					
EQT662	WJB - Wastewater Storage T-1B																					

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS				40 CFR 61				40 CFR 63 MESHAP				40 CFR				
		A	Ob	Kb	VV	DDD	RRR	A	J	V	FF	A	F	G	H	Q	64	68
EQT705	Scrubber Knock-Out Pot D-201																	
EQT706	Loading Rack Area																	
EQT707	Scrubber Knock-Out Pot D-200A																	
EQT708	Scrubber Knock-Out Pot D-200B																	
EQT709	A-Train Cooling, Drying, and Compression Area																	
EQT710	A-Train Liquefaction Area																	
EQT711	B-Train Liquefaction Area																	
EQT712	A-Train Purification Area																	
EQT713	B-Train Purification Area																	
EQT714	Rectifier Area																	
EQT715	Storage Area																	
EQT716	Tail Gas Vents																	
EQT717	Chlorine User Lines																	
FUG015	UZ - Fugitive Emissions																	
UNP006	Chlorine/Cell Service Plant											1						

KEY TO MATRIX

- 1 - The regulations have applicable requirements which apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, and fugitives) but do not apply to this particular emission source.
- Blank - The regulations clearly do not apply to this type of emission source.

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XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Status	Citation	Explanation
EQT 619	LAC 33:III.2115 - Waste Gas Disposal	Exempt	LAC 33:III.2115.H.1.d	VOC concentration < 3000 ppmv
EQT 624 thru EQT 640				
EQT 645, EQT 646, EQT 647				
EQT 650 thru EQT 656				
EQT 620, EQT 621, EQT 623	LAC 33:III.5109.A - MACT requirements	Does not apply	LAC 33:III.5109.A	Emits Class III TAP only. MACT is not required
EQT 641, EQT 642, EQT 643				
EQT 657 thru EQT 662				
EQT 624, EQT 625	40 CFR 64 - CAM	Exempt	40 CFR 64.2(b)(1)(vi)	Subject to continuous compliance requirements of the permit.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 2 or 3 in the matrix presented in Section X of this permit

40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
 - 1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
 - 2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];

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3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
 4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit. [Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
 2. the date(s) analyses were performed;
 3. the company or entity that performed the analyses;
 4. the analytical techniques or methods used;
 5. the results of such analyses; and
 6. the operating conditions as existing at the time of sampling or measurement.
- [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]
- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year.

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[LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]

- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
 1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
 5. changes in emissions would not qualify as a significant modification; and
 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]

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- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
 - a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December
 4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;

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- 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
 - 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
 - 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
 - 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
 - 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
- The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]
- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application dated October 16, 2008.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.
This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods

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described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.

- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
 - A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
 - 1. Report by June 30 to cover January through March
 - 2. Report by September 30 to cover April through June
 - 3. Report by December 31 to cover July through September
 - 4. Report by March 31 to cover October through December
 - D. Each report submitted in accordance with this condition shall contain the following information:

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1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
 2. Be less than the minimum emission rate (MER)
 3. Be scheduled daily, weekly, monthly, etc., or
 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]
- These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.
- XVIII. Provisions of the permit may be appealed to the secretary in writing pursuant to La. R.S. 30:2024(A) within 30 days from notice of the permit action. A request may be made to the secretary to suspend those provisions of the permit specifically appealed. The permit remains in effect to the extent that the secretary or assistant secretary does not elect to suspend the appealed provisions as requested or, at his discretion, other permit provisions as well. Construction cannot proceed, except as specifically approved by the secretary or assistant secretary, until a final decision has been rendered on the appeal. A request for hearing must be sent to the Office of the Secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

AI ID: 1409 The Dow Chemical Co - Louisiana Operations
Activity Number: PER20080038
Permit Number: 2573-V5
Air - Title V Regular Permit Minor Mod

Also Known As:	ID	Name	User Group	Start Date
RAL-020	1280-00008	Regulated Asbestos Landfill	Asbestos	12-15-2006
38-1285128	LAD008187080	Dow Chemical Co - Louisiana Division	CDS Number	05-27-1993
PMTICA	00290	Federal Tax ID	Federal Tax ID	11-21-1999
	LAD008187080	Dow Chemical Co LA Operations	Hazardous Waste Notification	01-29-1986
	LA00033301	GPRM Baselines	Hazardous Waste Permitting	10-01-1987
	LAR05N128	Dow Chemical	Inactive & Abandoned Sites	09-01-1986
	LAR10B702	Dow Chemical USA	Inactive & Abandoned Sites	06-03-1981
	LAR10C623	LPDES #	LPDES Permit #	05-27-1993
	LAR10D056	LPDES #	LPDES Permit #	10-24-2001
	LAR10D101	LPDES #	LPDES Permit #	03-24-2003
	LAR10D431	LPDES #	LPDES Permit #	10-28-2004
	GP1596	LWDPs #	LPDES Permit #	06-13-2005
	WP1561	LWDPs #	LPDES Permit #	08-23-2005
	WP1654	LWDPs #	LPDES Permit #	04-01-2006
LA-2002-L02	2002	Priority 1 Emergency Site	Priority 1 Emergency Site	11-21-1999
GPDT-047-0107	1280A0002	Radioactive Material License	Radiation License Number	06-25-2003
	11649	X-Ray Registration Number	Radiation X-ray Registration Number	06-25-2003
	126305	Site ID #	Solid Waste Facility No..	07-18-2006
	19794	Stage II Vapor Recovery	Stage II Vapor Recovery	03-12-2001
	38771	Dow Chemical USA	TEMPO Merge	11-21-1999
	41283	Dow Chemical Co - Vinyl II Cooling Tower	TEMPO Merge	04-30-2001
	44749	Dow Chemical USA - LA Division New Tank Farm	TEMPO Merge	08-19-2002
	44946	Dow Chemical Co - LA Operations	TEMPO Merge	05-22-2001
	52295	Dow Chemical Co	TEMPO Merge	05-22-2001
	70765THDWCHIGHW	Dow Lighthouse Rd	TEMPO Merge	08-25-2002
	24011629	Dow Chemical USA	TEMPO Merge	05-22-2001
		Dow Chemical USA - Coal Gasification	TEMPO Merge	05-22-2001
		TRI #	Toxic Release Inventory	07-08-2004
		UST Facility ID #	UST FID #	10-11-2002

General Information

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Activity Number: PER20080038
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Air - Title V Regular Permit Minor Mod

Physical Location:	21255 Hwy 1 (portion of) Plaquemine, LA 70765	Mailing Address:	PO Box 150 Plaquemine, LA 707650150	Location of Front Gate:	30° 18' 49" 0 hundredths latitude. 91° 14' 25" 37 hundredths longitude. Coordinate Method: Lat\Long - DMS. Coordinate Datum: NAD83	Main Phone:	22535388888
Related People:	Name	Mailing Address	Phone (Type)	Relationship			
	Catherine Bilello	PO Box 150 Plaquemine, LA 707650150	2253536595 (WP)	Responsible Official for			
	Robert Brandl	PO Box 150 Plaquemine, LA 707650150	2253538938 (WP)	Responsible Official for			
	Dan Bucholtz	PO Box 150 Plaquemine, LA 707650150	2253533802 (WP)	Responsible Official for			
	Mike Christal	PO Box 150 Plaquemine, LA 707650150	2253531660 (WP)	Responsible Official for			
	Delia Contreras	PO Box 150 Plaquemine, LA 707650150	2253536192 (WP)	Responsible Official for			
	Dennis Davis	PO Box 150 Plaquemine, LA 707650150	2253536128 (WP)	Water Billing Party for			
	Dennis Davis	PO Box 150 Plaquemine, LA 707650150	2253536128 (WP)	Accident Prevention Billing Party for			
	Dennis Davis	PO Box 150 Plaquemine, LA 707650150	2253536128 (WP)	Stage II Vapor Recovery Billing Party for			
	Dennis Davis	PO Box 150 Plaquemine, LA 707650150	2253536128 (WP)	Solid Waste Billing Party for			
	Bart Dolezal	PO Box 150 Plaquemine, LA 707650150	2253536039 (WP)	Responsible Official for			
	Ivy Dupree	21255 Hwy 1 S Plaquemine, LA 70765	2253531630 (WP)	Remediation Contact for			
	Richard Durham	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253531514 (WP)	Underground Storage Tank Contact for			
	Richard Durham	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253631512 (WP)	Hazardous Waste Permit Contact For			
	Tim Gunn	PO Box 150 Plaquemine, LA 707650150	2253531512 (WP)	Responsible Official for			
	Dan Jason	PO Box 150 Plaquemine, LA 707650150	2253531642 (WP)	Responsible Official for			
	Gretchen LeBlanc	PO Box 150 Plaquemine, LA 707650150	2253535871 (WP)	Responsible Official for			
	Craig Leopard	PO Box 150 Plaquemine, LA 707650150	2253536472 (WP)	Responsible Official for			
	Donald Lye	PO Box 150 Plaquemine, LA 707650150	2253536148 (WP)	Responsible Official for			
	Vic McMurray	PO Box 150 Plaquemine, LA 707650150	2253538116 (WP)	Emission Inventory Contact for			
	Will Nipper	PO Box 150 Plaquemine, LA 707650150	wnipper@dow.com	Emission Inventory Contact for			
	Brad Rabais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	2253226146 (DP)	Radiation Contact For			
	Brad Rabais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	2253226146 (DP)	Radiation Safety Officer for			
	Brad Rabais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	2253538001 (WF)	Radiation Safety Officer for			
	Brad Rabais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	BRABALAIS@DCW	Radiation Safety Officer for			
	Brad Rabais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	BRABALAIS@DCW	Radiation Contact For			
	Brad Rabais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	2253538901 (WF)	Radiation Contact For			
	Brad Rabais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	2253536146 (WP)	Radiation Contact For			
	Brad Rabais	21255 Hwy 1 Bldg 3502 Plaquemine, LA 70764	2253536146 (WP)	Radiation Safety Officer for			
	Chris Reed	PO Box 150 Plaquemine, LA 707650150	2253538948 (WP)	Responsible Official for			

General Information

AIID: 1409 The Dow Chemical Co - Louisiana Operations

Activity Number: PER20080038

Permit Number: 2573-V5

Air - Title V Regular Permit Minor Mod

Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Lee Trusty	PO Box 150 Plaquemine, LA 707650150		Responsible Official for
	Gill Walker	PO Box 150 Plaquemine, LA 707650150	2253535B73 (WP)	Responsible Official for
	Susan Williams	PO Box 150 Plaquemine, LA 707650150	2253535317 (WP)	Responsible Official for
	David Wilson	PO Box 150 Plaquemine, LA 707650150	2253536583 (WP)	Responsible Official for

Related Organizations:	Name	Address	Phone (Type)	Relationship
	JE Merit Constructors Inc	4949 Essen Ln Baton Rouge, LA 70898	2257685548 (WP)	Provides environmental services for
	National Maintenance Corp	2865 Mason St Baton Rouge, LA 70865		Provides environmental services for
	Petrin Corp.	1405 Commercial Dr Port Allen, LA 70767		Provides environmental services for
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	Radiation License Billing Party for
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	Emission Inventory Billing Party
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	Air Billing Party for
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	Radiation Registration Billing Party for
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	Owns
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2253538888 (WP)	UST Billing Party for

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-0775 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations

Activity Number: PER20080038

Permit Number: 2573-V5

Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Chlorine/Cell Service Plant						
EOT 0619	10 - Chlorine Carbonate Tower	15600 lb/hr	9290 lb/hr	9290 lb/hr		8760 hr/yr
EOT 0620	120 - Sludge Acidification Unit T-10	4500 lb/hr	1000 lb/hr	1000 lb/hr		8760 hr/yr
EOT 0621	130 - B-Train Cell Header/Drain					8760 hr/yr
EOT 0622	CF - Equipment Opening Losses					8760 hr/yr
EOT 0623	150 - Cooling Water Tower CT-701	5000 gallons/min	5000 gallons/min	5000 gallons/min		8760 hr/yr
EOT 0624	19 - Chlorine Plant Scrubber AT-200A					8760 hr/yr
EOT 0625	UA - Chlorine Plant Scrubber AT-200B					8760 hr/yr
EOT 0626	UB - Hydrogen Slatck HS-1W	2800 ft^3/min	2800 ft^3/min	2800 ft^3/min		8760 hr/yr
EOT 0627	UC - Hydrogen Slatck HS-1E	2800 ft^3/min	2800 ft^3/min	2800 ft^3/min		8760 hr/yr
EOT 0628	UD - Hydrogen Slatck HS-2W	2800 ft^3/min	2800 ft^3/min	2800 ft^3/min		8760 hr/yr
EOT 0629	UE - Hydrogen Slatck HS-2E	2800 ft^3/min	2800 ft^3/min	2800 ft^3/min		8760 hr/yr
EOT 0630	UF - Hydrogen Slatck HS-3W	2800 ft^3/min	2800 ft^3/min	2800 ft^3/min		8760 hr/yr
EOT 0631	UG - Hydrogen Slatck HS-3E	2800 ft^3/min	2800 ft^3/min	2800 ft^3/min		8760 hr/yr
EOT 0632	UH - Hydrogen Slatck HS-4W	2800 ft^3/min	2800 ft^3/min	2800 ft^3/min		8760 hr/yr
EOT 0633	UI - Hydrogen Slatck HS-4E	2800 ft^3/min	2800 ft^3/min	2800 ft^3/min		8760 hr/yr
EOT 0634	UJ - Hydrogen Slatck HS-5W	2800 ft^3/min	2800 ft^3/min	2800 ft^3/min		8760 hr/yr
EOT 0635	UK - Hydrogen Slatck HS-5E	8333 ft^3/min	3334 ft^3/min	3334 ft^3/min		8760 hr/yr
EOT 0636	UL - Hydrogen Slatck T-704A					8760 hr/yr
EOT 0637	UM - Hydrogen Slatck T-704B					8760 hr/yr
EOT 0638	UN - Hydrogen Slatck T-99W	10002 ft^3/min	6668 ft^3/min	6668 ft^3/min		8760 hr/yr
EOT 0639	UO - Hydrogen Slatck T-99E	10002 ft^3/min	6668 ft^3/min	6668 ft^3/min		8760 hr/yr
EOT 0640	UP - Carbonate Storage Tank T-18	400 gallons/min	150 gallons/min	150 gallons/min		8760 hr/yr
EOT 0641	UQ - HCl Storage T-29	23100 gallons	64.5 MM gallons/yr			8760 hr/yr
EOT 0642	UR - HCl Storage T-24	23100 gallons	64.5 MM gallons/yr			8760 hr/yr
EOT 0643	US - H2SO4 Storage T-25	26500 gallons				8760 hr/yr
EOT 0644	UT - Bisulfite Tank T-900	13000 gallons	691200 gallons/yr			8760 hr/yr
EOT 0645	UWA - Mix Tank MT-1A	234630 gallons	9000 gallons/min	7000 gallons/min		8760 hr/yr
EOT 0646	UWB - Mix Tank MT-1B	234630 gallons	9000 gallons/min	7000 gallons/min		8760 hr/yr
EOT 0647	UX - Lab Vents			1 liters/min		8760 hr/yr
EOT 0648	UY - Block Analyzers					8760 hr/yr
EOT 0649	V0 - Crushed Cell Frames and Covers					8760 hr/yr
EOT 0650	V1A - Brine Storage Tank CL-13A	90000 gallons/min	3500 gallons/min	3500 gallons/min		8760 hr/yr
EOT 0651	V1B - Brine Storage Tank CL-13B	90000 gallons/min	3500 gallons/min	3500 gallons/min		8760 hr/yr
EOT 0652	V1C - Brine Storage Tank T-4A					8760 hr/yr
EOT 0653	V1D - Brine Storage Tank T-4B					8760 hr/yr
EOT 0654	V1E - Brine Storage Tank T-117					8760 hr/yr
EOT 0655	V1F - Brine Storage Tank T-400					8760 hr/yr
EOT 0656	V2A - Cell Header VSP-1			30 gallons/min	30 gallons/min	8760 hr/yr
EOT 0658	V2B - Cell Header VSP-2			30 gallons/min	30 gallons/min	8760 hr/yr

INVENTORIES

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
 Activity Number: PER20080038
 Permit Number: 2573-V5
 Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Chlorine/Cell Service Plant						
EQT 0659	V3A - Seal pot SP-20A		10 gallons/min	10 gallons/min		8760 hr/yr
EQT 0660	V3B - Seal pot SP-20B		10 gallons/min	10 gallons/min		8760 hr/yr
EQT 0661	WJA - Wastewater Storage T-1A		75 gallons/min	50 gallons/min		8760 hr/yr
EQT 0662	WJB - Wastewater Storage T-1B		75 gallons/min	50 gallons/min		8760 hr/yr
EQT 0705	- Scrubber Knock-Out Pot D-201					8760 hr/yr
EQT 0706	D-201 - Scrubber Knock-Out Pot D-201					8760 hr/yr
EQT 0707	- Scrubber Knock-Out Pot D-200A					8760 hr/yr
EQT 0708	- Scrubber Knock-Out Pot D-200B					8760 hr/yr
EQT 0709	- A-Train Cooling, Drying, and Compression Area					8760 hr/yr
EQT 0710	- A-Train Liquefaction Area					8760 hr/yr
EQT 0711	- B-Train Liquefaction Area					8760 hr/yr
EQT 0712	- A-Train Purification Area					8760 hr/yr
EQT 0713	- B-Train Purification Area					8760 hr/yr
EQT 0714	- Rectifier Area					8760 hr/yr
EQT 0715	- Storage Area					8760 hr/yr
EQT 0716	- Tail Gas Vents					8760 hr/yr
EQT 0717	- Chlorine User Lines					8760 hr/yr
FUG 0015	UZ - Fugitive Emissions					8760 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Chlorine/Cell Service Plant							
EQT 0619	10 - Chlorine Carbonate Tower	.27	140	4.5		71	85
EQT 0620	20 - Sludge Acidification Unit T-10	.02	155	1		30	40
EQT 0621	30 - B-Train Cell Header Drain			2		5	75
EQT 0624	U9 - Chlorine Plant Scrubber AT-200A	5.2	2205	3		76	167
EQT 0625	UA - Chlorine Plant Scrubber AT-200B	5.2	2205	3		76	167
EQT 0626	UB - Hydrogen Stack HS-1W	35	1667	1		40	140
EQT 0627	UC - Hydrogen Stack HS-1E	35	1667	1		40	140
EQT 0628	UD - Hydrogen Stack HS-2W	35	1667	1		40	140
EQT 0629	UE - Hydrogen Stack HS-2E	35	1667	1		40	140
EQT 0630	UF - Hydrogen Stack HS-3W	35	1667	1		40	140
EQT 0631	UG - Hydrogen Stack HS-3E	.35	1667	1		40	140
EQT 0632	UH - Hydrogen Stack HS-4W	35	1667	1		40	140
EQT 0633	UI - Hydrogen Stack HS-4E	35	1667	1		40	140

INVENTORIES

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
 Activity Number: PER20080038
 Permit Number: 2573-V5
 Air - Title V Regular Permit Minor Mod

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
Chlorine/Cell Service Plant							
EQT 0634	UJ - Hydrogen Stack HS-5W	35	1667	1	—	40	140
EQT 0635	UK - Hydrogen Stack HS-5E	35	1667	1	—	40	140
EQT 0636	UL - Hydrogen Stack T-704A	255	8333	83	—	50	130
EQT 0637	UM - Hydrogen Stack T-704B	255	8333	83	—	50	130
EQT 0638	UN - Hydrogen Stack T-99W	53	10002	2	—	50	130
EQT 0639	UO - Hydrogen Stack T-99E	53	10002	2	—	50	130
EQT 0640	UP - Carbonate Storage Tank T-18	1	.1	.5	—	15	—
EQT 0641	UQ - HCl Storage T-29	.56	.01	5	—	24	86
EQT 0642	UR - HCl Storage T-24	2.8	.06	17	—	12	86
EQT 0643	US - H2SO4 Storage T-25	9.4	.128	17	—	12	86
EQT 0644	UT - Bisulfite Tank T-900	4	.21	33	—	20	86
EQT 0645	UWA - Mix Tank MT-1A	—	—	32	—	41	86
EQT 0646	UWB - Mix Tank MT-1B	—	—	32	—	41	86
EQT 0647	UX - Lab Vents	—	—	—	—	—	86
EQT 0649	V0 - Crushed Cell Frames and Covers	—	—	—	—	—	86
EQT 0650	V1A - Brine Storage Tank CL-13A	—	—	120	—	25	86
EQT 0651	V1B - Brine Storage Tank CL-13B	—	—	130	—	25	86
EQT 0652	V1C - Brine Storage Tank T-4A	—	—	130	—	16	—
EQT 0653	V1D - Brine Storage Tank T-4B	—	—	130	—	16	86
EQT 0654	V1E - Brine Storage Tank T-117	—	—	29.25	—	25	86
EQT 0655	V1F - Brine Storage Tank T-400	—	—	14	—	43	86
EQT 0657	V2A - Cell Header VSP-1	—	—	33	—	5	100
EQT 0658	V2B - Cell Header VSP-2	—	—	33	—	5	100
EQT 0659	V3A - Seal pot SP-20A	—	—	1	—	3	100
EQT 0660	V3B - Seal pot SP-20B	—	—	1	—	3	100
EQT 0661	WJA - Wastewater Storage T-1A	—	—	—	—	32	86
EQT 0662	WJB - Wastewater Storage T-1B	—	—	—	—	5100	32
Relationships:							
EQT 0705	Scrubber Knock-Out Pot D-201	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A	—	—	—
EQT 0705	Scrubber Knock-Out Pot D-201	Controlled by	EQT 0625	UA - Chlorine Plant Scrubber AT-200B	—	—	—
EQT 0706	D-201 - Scrubber Knock-Out Pot D-201	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A	—	—	—

Relationships:

ID	Description	Relationship	ID	Description
EQT 0705	Scrubber Knock-Out Pot D-201	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A
EQT 0705	Scrubber Knock-Out Pot D-201	Controlled by	EQT 0625	UA - Chlorine Plant Scrubber AT-200B
EQT 0706	D-201 - Scrubber Knock-Out Pot D-201	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A

INVENTORIES

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
 Activity Number: PER20080038
 Permit Number: 2573-V5
 Air - Title V Regular Permit Minor Mod

Relationships:

ID	Description	Relationship	ID	Description
EQT 0706	D-201 - Scrubber Knock-Out Pot D-201	Controlled by	EQT 0625	UA - Chlorine Plant Scrubber AT-200B
EQT 0707	- Scrubber Knock-Out Pot D-200A	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A
EQT 0707	- Scrubber Knock-Out Pot D-200A	Controlled by	EQT 0625	UA - Chlorine Plant Scrubber AT-200B
EQT 0708	- Scrubber Knock-Out Pot D-200B	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A
EQT 0708	- Scrubber Knock-Out Pot D-200B	Controlled by	EQT 0625	UA - Chlorine Plant Scrubber AT-200B
EQT 0709	- A-Train Cooling, Drying, and Compression Area	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A
EQT 0709	- A-Train Cooling, Drying, and Compression Area	Controlled by	EQT 0625	UA - Chlorine Plant Scrubber AT-200B
EQT 0710	- A-Train Liquefaction Area	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A
EQT 0710	- A-Train Liquefaction Area	Controlled by	EQT 0625	UA - Chlorine Plant Scrubber AT-200B
EQT 0711	- B-Train Liquefaction Area	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A
EQT 0711	- B-Train Liquefaction Area	Controlled by	EQT 0625	UA - Chlorine Plant Scrubber AT-200B
EQT 0712	- A-Train Purification Area	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A
EQT 0712	- A-Train Purification Area	Controlled by	EQT 0625	UA - Chlorine Plant Scrubber AT-200B
EQT 0713	- B-Train Purification Area	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A
EQT 0713	- B-Train Purification Area	Controlled by	EQT 0625	UA - Chlorine Plant Scrubber AT-200B
EQT 0714	- Rectifier Area	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A
EQT 0714	- Rectifier Area	Controlled by	EQT 0625	UA - Chlorine Plant Scrubber AT-200B
EQT 0715	- Storage Area	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A
EQT 0715	- Storage Area	Controlled by	EQT 0625	UA - Chlorine Plant Scrubber AT-200B
EQT 0716	- Tail Gas Vents	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A
EQT 0716	- Tail Gas Vents	Controlled by	EQT 0625	UA - Chlorine Plant Scrubber AT-200B
EQT 0717	- Chlorine User Lines	Controlled by	EQT 0624	U9 - Chlorine Plant Scrubber AT-200A
EQT 0717	- Chlorine User Lines	Controlled by	EQT 0625	UA - Chlorine Plant Scrubber AT-200B

Subject Item Groups:

ID	Group Type	Group Description	Member of Groups
CRG 0020	Common Requirements Group	- MACT	
CRG 0021	Common Requirements Group	- Hydrogen Slack	
GRP 0082	Equipment Group	- T0 - Mix Tanks and Brine Tanks Cap	
GRP 0083	Equipment Group	- U0 - Hydrogen Vent Stacks Cap	
UNF 0006	Unit or Facility Wide	- Chlorine/Cell Service Plant	
EQT 0619	10 - Chlorine Carbonate Tower		CRG0000000020
EQT 0626	UB - Hydrogen Slack HS-1W		CRG0000000021, GRP0000000083

INVENTORIES

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Group Membership:

ID	Description	Member of Groups
EQT 0627	UC - Hydrogen Stack HS-1E	CRG00000000021, GRP00000000083
EQT 0628	UD - Hydrogen Stack HS-2W	CRG00000000021, GRP00000000083
EQT 0629	UE - Hydrogen Stack HS-2E	CRG00000000021, GRP00000000083
EQT 0630	UF - Hydrogen Stack HS-3W	CRG00000000021, GRP00000000083
EQT 0631	UG - Hydrogen Stack HS-3E	CRG00000000021, GRP00000000083
EQT 0632	UH - Hydrogen Stack HS-4W	CRG00000000021, GRP00000000083
EQT 0633	UI - Hydrogen Stack HS-4E	CRG00000000021, GRP00000000083
EQT 0634	UJ - Hydrogen Stack HS-5W	CRG00000000021, GRP00000000083
EQT 0635	UK - Hydrogen Stack HS-5E	CRG00000000021, GRP00000000083
EQT 0636	UL - Hydrogen Stack T-704A	CRG00000000021
EQT 0637	UM - Hydrogen Stack T-704B	CRG00000000021
EQT 0638	UN - Hydrogen Stack T-99W	CRG00000000021
EQT 0639	UO - Hydrogen Stack T-99E	CRG00000000021
EQT 0640	UP - Carbonate Storage Tank T-18	CRG00000000020
EOT 0645	UWA - Mix Tank MT-1A	CRG00000000020, GRP00000000082
EOT 0646	UWB - Mix Tank MT-1B	CRG00000000020, GRP00000000082
EOT 0649	V0 - Crushed Cell Frames and Covers	CRG00000000020
EOT 0650	V1A - Brine Storage Tank CL-13A	CRG00000000020, GRP00000000082
EOT 0651	V1B - Brine Storage Tank CL-13B	CRG00000000020, GRP00000000082
EOT 0652	V1C - Brine Storage Tank T-4A	CRG00000000020, GRP00000000082
EOT 0653	V1D - Brine Storage Tank T-4B	CRG00000000020, GRP00000000082
EOT 0654	V1E - Brine Storage Tank T-117	CRG00000000020, GRP00000000082
EOT 0655	V1F - Brine Storage Tank T-400	CRG00000000020, GRP00000000082

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
1710	1710 Negotiated Fee	48417	\$ New App

SIC Codes:

2812	Alkalies and chlorine	UNF 006
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EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations

Activity Number: PER20080038

Permit Number: 2573-V5

Air - Title V Regular Permit Minor Mod

Subject Item	CO			PM 10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year									
Chlorine/Cell Service Plant												
EQT 0619 ₁₀	0.23	0.61	1.00							0.01	0.02	0.02
EQT 0620 ₂₀	0.01	0.07	0.04							0.20	144.59	0.87
EQT 0622 _{CF}												
EQT 0623 _{R0}				0.21	0.42	0.91						
EQT 0624 _{U9}										0.01	0.28	0.04
EQT 0625 _{UA}										0.01	0.28	0.04
EQT 0626 _{UB}				0.09		12.72						0.51
EQT 0627 _{UC}				0.09		12.72						0.51
EQT 0628 _{UD}				0.09		12.72						0.51
EQT 0629 _{UE}				0.09		12.72						0.51
EQT 0630 _{UF}				0.09		12.72						0.51
EQT 0631 _{UG}				0.09		12.72						0.51
EQT 0632 _{UH}				0.09		12.72						0.51
EQT 0633 _{UJ}				0.09		12.72						0.51
EQT 0634 _{UJ}				0.09		12.72						0.51
EQT 0635 _{UK}				0.09		12.72						0.51
EQT 0636 _{UL}	0.02	0.15	0.08	0.36		25.44	1.56			0.10	0.81	0.44
EQT 0637 _{UM}	0.02	0.15	0.08	0.36		25.44	1.56			0.10	0.81	0.44
EQT 0638 _{UN}	0.15	0.38	0.64	0.36		76.32	1.56			0.78	2.03	3.41
EQT 0639 _{UO}	0.01	0.23	0.03	0.36		76.32	1.56			0.03	1.22	0.15
EQT 0640 _{UP}	0.01	0.02	0.02							<0.01	<0.01	<0.01
EQT 0644 _{UR}										0.04	3.02	0.16
EQT 0645 _{UWA}												16.90

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations

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Air - Title V Regular Permit Minor Mod

Subject Item	CO			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year									
Chlorine/Cell Service Plant												
EOT 0646 UWB												
EOT 0647 UX												
EOT 0649 VP				<0.01	<0.01	<0.01				0.01	0.01	0.02
EOT 0650 VIA										<0.01	<0.01	<0.01
EOT 0651 VIB												
EOT 0652 VIC												
EOT 0653 V10												
EOT 0654 V1E												
EOT 0655 V1F												
FUG 0015 UZ										0.03	0.06	0.11
GRP 0082										2.1		9.21
GRP 0083	0.38	0.14	21.60		7.78				2.03		0.73	

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations

Activity Number: PER20080038

Permit Number: 2573-V5

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0619 10	1,2-Dichloroethane	<0.001	<0.001	0.004
	1,2-Dichloropropane	<0.01	<0.01	<0.01
	Benzene	<0.01	<0.01	<0.01
	Bromoform	<0.01	<0.01	<0.01
	Carbon tetrachloride	<0.01	<0.01	<0.01
	Chlorine	0.08	0.18	0.34
	Chlorobenzene	<0.001	<0.001	0.004
	Chloroform	<0.01	0.01	0.01
	Dichlorobenzene	<0.01	<0.01	<0.01
	Dichlorobromomethane	<0.01	<0.01	<0.01
	Dichloromethane	<0.01	<0.01	<0.01
	Diethanolamine	<0.01	<0.01	<0.01
	Ethyl benzene	<0.01	<0.01	<0.01
	Methyl chloride	<0.01	0.01	0.01
EQT 0620 20	Tetrachloroethylene	<0.01	<0.01	<0.01
	Toluene	<0.01	<0.01	<0.01
EQT 0621 30	Xylene (mixed isomers)	<0.01	<0.01	<0.01
	Hydrochloric acid	0.09	0.56	0.41
EQT 0622 CF	Chlorine	<0.01	<0.01	<0.01
	Carbon tetrachloride	0.20	144.59	0.87
	Chlorine	0.06	0.30	0.18
	Hydrochloric acid	0.03	0.04	<0.01
EQT 0623 R0	Sulfuric acid	<0.01	<0.01	<0.01
	Chlorine	<0.01	<0.01	<0.01
EQT 0624 U9	Carbon tetrachloride	0.01	0.21	0.03
	Chlorine	0.36	2.04	1.56
	Chloroform	<0.01	0.07	0.01
EQT 0625 UA	Carbon tetrachloride	0.01	0.21	0.03
	Chlorine	0.36	2.04	1.56
	Chloroform	<0.01	0.07	0.01
EQT 0626 UB	1,2-Dichloroethane		0.080	
	Carbon tetrachloride		0.04	
	Chlorine		1.00	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations

Activity Number: PER20080038

Permit Number: 2573-V5

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0626 UB	Chloroform		0.26	
	Dichloromethane		0.19	
	Methyl chloride		0.11	
	Tetrachloroethylene		0.04	
	Vinyl chloride		0.01	
EQT 0627 UC	1,2-Dichloroethane		0.080	
	Carbon tetrachloride		0.04	
	Chlorine		1.00	
	Chloroform		0.26	
	Dichloromethane		0.19	
	Methyl chloride		0.11	
	Tetrachloroethylene		0.04	
	Vinyl chloride		0.01	
EQT 0628 UD	1,2-Dichloroethane		0.080	
	Carbon tetrachloride		0.04	
	Chlorine		1.00	
	Chloroform		0.26	
	Dichloromethane		0.19	
	Methyl chloride		0.11	
	Tetrachloroethylene		0.04	
	Vinyl chloride		0.01	
EQT 0629 UE	1,2-Dichloroethane		0.080	
	Carbon tetrachloride		0.04	
	Chlorine		1.00	
	Chloroform		0.26	
	Dichloromethane		0.19	
	Methyl chloride		0.11	
	Tetrachloroethylene		0.04	
	Vinyl chloride		0.01	
EQT 0630 UF	1,2-Dichloroethane		0.080	
	Carbon tetrachloride		0.04	
	Chlorine		1.00	
	Chloroform		0.26	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations

Activity Number: PER20080038

Permit Number: 2573-V5

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0630 UF	Dichloromethane		0.19	
	Methyl chloride		0.11	
	Tetrachloroethylene		0.04	
	Vinyl chloride		0.01	
EQT 0631 UG	1,2-Dichloroethane		0.080	
	Carbon tetrachloride		0.04	
	Chlorine		1.00	
	Chloroform		0.26	
	Dichloromethane		0.19	
	Methyl chloride		0.11	
	Tetrachloroethylene		0.04	
	Vinyl chloride		0.01	
EQT 0632 UH	1,2-Dichloroethane		0.080	
	Carbon tetrachloride		0.04	
	Chlorine		1.00	
	Chloroform		0.26	
	Dichloromethane		0.19	
	Methyl chloride		0.11	
	Tetrachloroethylene		0.04	
	Vinyl chloride		0.01	
EQT 0633 UI	1,2-Dichloroethane		0.080	
	Carbon tetrachloride		0.04	
	Chlorine		1.00	
	Chloroform		0.26	
	Dichloromethane		0.19	
	Methyl chloride		0.11	
	Tetrachloroethylene		0.04	
	Vinyl chloride		0.01	
EQT 0634 UJ	1,2-Dichloroethane		0.080	
	Carbon tetrachloride		0.04	
	Chlorine		1.00	
	Chloroform		0.26	
	Dichloromethane		0.19	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations

Activity Number: PER20080038

Permit Number: 2573-V5

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0634 UJ	Methyl chloride		0.11	
	Tetrachloroethylene		0.04	
	Vinyl chloride		0.01	
EQT 0635 UK	1,2-Dichloroethane		0.080	
	Carbon tetrachloride		0.04	
	Chlorine		1.00	
	Chloroform		0.26	
	Dichloromethane		0.19	
	Methyl chloride		0.11	
	Tetrachloroethylene		0.04	
	Vinyl chloride		0.01	
EQT 0636 UL	1,2-Dichloroethane	<0.001	<0.001	0.004
	Carbon tetrachloride	0.01	0.09	0.05
	Chlorine	0.01	0.40	0.05
	Chloroform	0.09	0.69	0.37
	Dichloromethane	0.04	0.31	0.17
	Methyl chloride	0.01	0.03	0.02
	Tetrachloroethylene	<0.01	0.01	<0.01
	Vinyl chloride	<0.01	<0.01	<0.01
EQT 0637 UM	1,2-Dichloroethane	<0.001	<0.001	0.004
	Carbon tetrachloride	0.01	0.09	0.05
	Chlorine	0.01	0.40	0.05
	Chloroform	0.09	0.69	0.37
	Dichloromethane	0.04	0.31	0.17
	Methyl chloride	0.01	0.03	0.02
	Tetrachloroethylene	<0.01	0.01	<0.01
	Vinyl chloride	<0.01	<0.01	<0.01
EQT 0638 UN	1,2-Dichloroethane	<0.001	<0.001	0.004
	Carbon tetrachloride	0.08	0.21	0.36
	Chlorine	0.03	3.58	0.15
	Chloroform	0.66	1.72	2.89
	Dichloromethane	0.30	0.77	1.29
	Methyl chloride	0.03	0.08	0.14

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations

Activity Number: PER20080038

Permit Number: 2573-V5

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0638 UN	Tetrachloroethylene	0.01	0.01	0.02
	Vinyl chloride	<0.01	<0.01	<0.01
EQT 0639 UO	1,2-Dichloroethane	<0.001	<0.001	0.004
	Carbon tetrachloride	<0.01	0.13	0.02
	Chlorine	0.03	3.58	0.12
	Chloroform	0.03	1.03	0.12
	Dichloromethane	0.01	0.46	0.06
	Methyl chloride	<0.01	0.05	0.01
	Tetrachloroethylene	<0.01	0.01	<0.01
	Vinyl chloride	<0.01	<0.01	<0.01
EQT 0640 UP	1,2-Dichloroethane	<0.001	<0.001	0.004
	1,2-Dichloropropane	<0.01	<0.01	<0.01
	Benzene	<0.01	<0.01	<0.01
	Carbon tetrachloride	<0.01	<0.01	<0.01
	Chlorine	<0.01	0.01	<0.01
	Chlorobenzene	<0.001	<0.001	0.004
	Chloroethane	<0.01	<0.01	<0.01
	Chloroform	<0.01	<0.01	<0.01
	Dichlorobenzene	<0.01	<0.01	<0.01
	Dichlorobromomethane	<0.01	<0.01	<0.01
	Dichloromethane	<0.01	<0.01	<0.01
	Diethanolamine	<0.01	<0.01	<0.01
	Ethyl benzene	<0.01	<0.01	<0.01
	Methyl chloride	<0.01	<0.01	<0.01
	Tetrachloroethylene	<0.01	<0.01	<0.01
EQT 0641 UO	Toluene	<0.01	<0.01	<0.01
	Xylene (mixed isomers)	<0.01	<0.01	<0.01
	Hydrochloric acid	<0.01	0.03	0.01
EQT 0642 UR	Hydrochloric acid	<0.01	0.03	0.01
EQT 0643 US	Sulfuric acid	<0.01	<0.01	<0.01
EQT 0645 UWA	1,2-Dichloroethane		0.220	
	Benzene		0.20	
	Bromoform		1.30	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations

Activity Number: PER20080038

Permit Number: 2573-V5

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EOT 0645 UWA	Chloroform		0.17	
	Dichlorobromomethane		7.77	
	Dichloromethane		0.16	
	Ethyl benzene		0.02	
	Methyl chloride		0.35	
	Tetrachloroethylene		0.02	
	Toluene		0.09	
EOT 0646 UWB	Xylene (mixed isomers)		<0.01	
	1,2-Dichloroethane		0.206	
	Benzene		0.16	
	Bromoform		1.29	
	Chloroform		0.14	
	Dichlorobromomethane		3.21	
	Dichloromethane		0.14	
	Ethyl benzene		0.02	
	Methyl chloride		0.24	
	Tetrachloroethylene		0.02	
EOT 0647 UX	Toluene		0.07	
	Xylene (mixed isomers)		<0.01	
	Carbon tetrachloride	<0.01	0.01	0.01
	Chlorine	0.01	0.01	0.02
	Chloroform	<0.01	<0.01	<0.01
	Hydrochloric acid	<0.01	<0.01	0.01
	Nitric acid	<0.01	0.01	0.01
EOT 0648 UY	Sulfuric acid	0.01	0.01	0.02
	Chlorine	<0.01	<0.01	0.01
EOT 0649 V0	Hexachlorobenzene	<0.01	<0.01	<0.01
EOT 0650 V1A	1,2-Dichloroethane		0.101	
	Benzene		0.02	
	Bromoform		2.53	
	Chloroform		0.03	
	Dichlorobromomethane		0.10	
	Dichloromethane		0.04	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations

Activity Number: PER20080038

Permit Number: 2573-V5

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0650 VIA	Ethyl benzene		<0.01	
	Methyl chloride		0.01	
	Tetrachloroethylene		<0.01	
	Toluene		<0.01	
	Xylene (mixed isomers)		<0.01	
EQT 0651 VIB	1,2-Dichloroethane		0.079	
	Benzene		0.02	
	Bromoform		2.21	
	Chloroform		0.02	
	Dichlorobromomethane		0.07	
	Dichloromethane		0.03	
	Ethyl benzene		<0.01	
	Methyl chloride		0.01	
	Tetrachloroethylene		<0.01	
	Toluene		<0.01	
EQT 0652 VIC	Xylene (mixed isomers)		<0.01	
	1,2-Dichloroethane		0.038	
	Benzene		<0.01	
	Bromoform		1.23	
	Chloroform		<0.01	
	Dichlorobromomethane		0.03	
	Dichloromethane		0.01	
	Ethyl benzene		<0.01	
	Methyl chloride		<0.01	
	Tetrachloroethylene		<0.01	
EQT 0653 VID	Toluene		<0.01	
	Xylene (mixed isomers)		<0.01	
	1,2-Dichloroethane		0.038	
	Benzene		0.01	
	Bromoform		1.22	
	Chloroform		0.01	
EQT 0653 VID	Dichlorobromomethane		0.03	
	Dichloromethane		0.01	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations

Activity Number: PER20080038

Permit Number: 2573-V5

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EOT 0653 V1D	Ethyl benzene		<0.01	
	Methyl chloride		<0.01	
	Tetrachloroethylene		<0.01	
	Toluene		<0.01	
	Xylene (mixed isomers)		<0.01	
EQT 0654 V1E	1,2-Dichloroethane		0.002	
	Benzene		<0.01	
	Bromoform		0.06	
	Chloroform		<0.01	
	Dichlorobromomethane		<0.01	
	Dichloromethane		<0.01	
	Ethyl benzene		<0.01	
	Methyl chloride		<0.01	
	Tetrachloroethylene		<0.01	
	Toluene		<0.01	
EQT 0655 V1F	Xylene (mixed isomers)		<0.01	
	1,2-Dichloroethane		<0.001	
	Benzene		<0.01	
	Bromoform		0.01	
	Chloroform		<0.01	
	Dichlorobromomethane		<0.01	
	Dichloromethane		<0.01	
	Ethyl benzene		<0.01	
	Methyl chloride		<0.01	
	Tetrachloroethylene		<0.01	
EOT 0657 V2A	Toluene		<0.01	
	Xylene (mixed isomers)		<0.01	
	Chlorine	<0.01	<0.01	<0.01
	Chlorine	<0.01	<0.01	<0.01
	Chlorine	<0.01	<0.01	<0.01
EOT 0658 V2B	Chlorine	<0.01	<0.01	<0.01
EOT 0659 V3A	Chlorine	<0.01	<0.01	<0.01
EOT 0660 V3B	Chlorine	<0.01	<0.01	<0.01
EOT 0661 WJA	Chlorine	<0.01	<0.01	<0.01
EOT 0662 WJB	Chlorine	<0.01	<0.01	<0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations

Activity Number: PER20080038

Permit Number: 2573-V5

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
FUG 0015 UZ	Ammonia	<0.01	<0.01	0.01
	Carbon tetrachloride	0.03	0.06	0.10
	Chlorine	0.04	0.08	0.18
	Chloroform	<0.01	<0.01	0.01
	Hydrochloric acid	0.01	0.03	0.04
	Sulfuric acid	0.02	0.02	0.09
GRP 0082	1,2-Dichloroethane	0.028		0.124
	Benzene	0.33		1.42
	Bromoform	1.07		4.67
	Chloroform	0.09		0.41
	Dichlorobromomethane	0.46		2.02
	Dichloromethane	0.05		0.23
	Ethyl benzene	0.01		0.04
	Methyl chloride	0.01		0.04
	Tetrachloroethylene	0.01		0.04
	Toluene	0.07		0.29
GRP 0083	Xylene (mixed isomers)	0.02		0.10
	1,2-Dichloroethane	<0.001		0.004
	Carbon tetrachloride	0.21		0.08
	Chlorine	0.14		0.60
	Chloroform	1.72		0.62
	Dichloromethane	0.77		0.28
	Methyl chloride	0.08		0.03
	Tetrachloroethylene	0.02		0.01
UNF 0006	Vinyl chloride	<0.01		<0.01
	1,2-Dichloroethane			0.152
	1,2-Dichloropropane			<0.01
	Ammonia			0.01
	Benzene			1.42
	Bromoform			4.67
	Carbon tetrachloride			1.60
	Chlorine			4.82
	Chlorobenzene			0.008

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations

Activity Number: PER20080038

Permit Number: 2573-V5

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0006	Chloroform			4.82
	Dichlorobenzene			<0.01
	Dichlorobromomethane			2.02
	Dichloromethane			2.20
	Diethanolamine			<0.01
	Ethyl benzene			0.04
	Hexachlorobenzene			<0.01
	Hydrochloric acid			0.48
	Methyl chloride			0.27
	Nitric acid			0.01
	Sulfuric acid			0.11
	Tetrachloroethylene			0.07
	Toluene			0.29
	Vinyl chloride			<0.01
	Xylene (mixed isomers)			0.10

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
 Activity Number: PER20080038
 Permit Number: 2573-V5
 Air - Title V Regular Permit Minor Mod

CRG 0020 - MACT

Group Members: EQT 0619EQT 0640EQT 0645EQT 0646EQT 0649EQT 0650EQT 0651EQT 0652EQT 0653EQT 0654EQT 0655

- 1 [LAC 33:III.5109.A] Shall control emissions to a degree that constitutes Maximum Achievable Control Technology (MACT). No additional control is determined as MACT.

CRG 0021 - Hydrogen Stack

Group Members: EQT 0626EQT 0627EQT 0628EQT 0629EQT 0630EQT 0631EQT 0632EQT 0633EQT 0634EQT 0635EQT 0636EQT 0637EQT 0638EQT 0639

Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

Which Months: All Year Statistical Basis: Six-minute average

To demonstrate continuous compliance with the opacity limits of this permit, Permittee shall visually inspect emissions from this stack on a weekly basis. If visible emissions are detected, then, within three (3) working days, the permittee shall conduct a six minute opacity reading in accordance with EPA Reference Method 9. Records of emission checks shall include emission Point ID, date visual check was performed, a record if visible emissions were detected, and a record of any Method 9 testing conducted and the results of any Method 9 test. These records shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.

Shall control emissions to a degree that constitutes Maximum Achievable Control Technology (MACT). No additional control is determined as MACT.

EQT 0622 CF - Equipment Opening Losses

Shall control emissions to a degree that constitutes Maximum Achievable Control Technology (MACT). Purging, clearing, and minimization of losses prior to equipment openings is determined as MACT.

EQT 0624 U9 - Chlorine Plant Scrubber AT-200A

6 [LAC 33:III.501.C.6]

Sodium Hydroxide monitored by technically sound method once every four hours.

Which Months: All Year Statistical Basis: Maximum single sample

Concentration of Sodium Hydroxide >= 1.5 % by weight.

Liquid Flow rate >= 250 gallons/min.

Flow rate monitored by flow rate monitoring device once every four hours.

Which Months: All Year Statistical Basis: Maximum single sample

Shall control emissions to a degree that constitutes Maximum Achievable Control Technology (MACT). No additional control is determined as MACT.

EQT 0625 UA - Chlorine Plant Scrubber AT-200B

SPECIFIC REQUIREMENTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
 Activity Number: PER20080038
 Permit Number: 2573.V5
 Air - Title V Regular Permit Minor Mod

EQT 0625 UA - Chlorine Plant Scrubber AT-200B

- 11 [LAC 33.III.501.C.6] Sodium Hydroxide monitored by technically sound method once every four hours.
Which Months: All Year Statistical Basis: Maximum single sample
- 12 [LAC 33.III.501.C.6] Concentration of Sodium Hydroxide $\geq 1.5\%$ by weight.
- 13 [LAC 33.III.501.C.6] Flow rate monitored by flow rate monitoring device once every four hours.
Which Months: All Year Statistical Basis: Maximum single sample
- 14 [LAC 33.III.501.C.6] Liquid Flow rate ≥ 250 gallons/min.
- 15 [LAC 33.III.5109.A] Shall control emissions to a degree that constitutes Maximum Achievable Control Technology (MACT). No additional control is determined as MACT.

EQT 0647 UX - Lab Vents

- 16 [LAC 33.III.5109.A] Shall control emissions to a degree that constitutes Maximum Achievable Control Technology (MACT). Minimize sample size at time of collection - Determined as MACT.

FUG 0015 UZ - Fugitive Emissions

- 17 [LAC 33.III.5109.A] Compressors (no detectable emissions): VOC, Total monitored by the regulation's specified method(s) once initially upon designation, annually, and at other times requested by DEQ, as specified in Paragraph E.10.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsections E.2 through E.9.
Which Months: All Year Statistical Basis: None specified
- 18 [LAC 33.III.5109.A] Connectors in gas/vapor service and in light liquid service (≤ 1 inch in diameter): VOC, Total monitored by the regulation's specified method(s) within 90 days after being returned to VOTAP service. Monitor each connector that has been opened or has otherwise had the seal broken, as specified in Paragraph O.8.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If the follow-up monitoring detects a leak, initiate repair provisions specified in Subsection O.9. Comply with this requirement instead of the requirements in Paragraph O.2.
Which Months: All Year Statistical Basis: None specified
- 19 [LAC 33.III.5109.A] Connectors in gas/vapor service and in light liquid service (unsafe-to-monitor): VOC, Total monitored by the regulation's specified method(s) at the regulation's specified frequency. Maintain a written plan that requires monitoring as frequently as practicable during safe to monitor periods, as specified in Subsection O.10.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method in Section P. Comply with this requirement instead of the requirements in Subsection O.2 through O.6.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations

Activity Number: PER20080038

Permit Number: 2573-V5

Air - Title V Regular Permit Minor Mod

FUG 0015 UZ - Fugitive Emissions

- 20 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (percent of leaking connectors > 2): VOC. Total monitored by the regulation's specified method(s) quarterly until good performance is obtained or until four quarterly monitorings have been performed, as specified in Subsections O.2 and O.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If good performance has not been obtained after four quarters of monitoring, monitor the remaining unchecked connectors within six months of the last quarterly monitoring period, as specified in Subsection O.6 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If monitoring of the remaining connectors indicates good performance, monitor in accordance with Subsection O.4. If monitoring of the remaining connectors indicates that good performance has not been obtained, monitor in accordance with Subsection O.5. Monitor using the method specified in Section P. If an instrument reading ≥ 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
- Which Months: All Year Statistical Basis: None specified
- Connectors in gas/vapor service and in light liquid service: Repair Leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Subsection O.8. Make a first attempt at repair no later than 5 calendar days after each leak is detected. If a leak is detected, monitor the for leaks within the first 90 days after its repair, as specified in Subsection O.9 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- Submit report: Due semiannually starting six months after the initial report required in Subsection R.1. Include the information specified in Paragraphs R.2.a through R.2.e, as specified in Subsection R.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- Pressure relief device in gas/vapor service: Equip with a closed-vent system capable of capturing and transporting leakage from the pressure relief device to a control device as described in Section N, as specified in Section F.2.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Alternative to Subsections F.1 and F.2.
- Connectors in gas/vapor service and in light liquid service: Calculate the percent leaking connectors using the equation in Subsection O.12 for use in determining the monitoring frequency, as specified in Subsection O.12 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: VOC, Total monitored by the regulation's specified method(s) within 5 days of finding evidence of a potential leak by visual, audible, olfactory, or any other detection method, as specified in Section K.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. If an instrument reading of 10000 ppm or greater for agitators, 2000 ppm or greater for pumps or 1000 ppm or greater for valves, connectors, instrument systems, or pressure relief devices is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection K.3.
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service and in light liquid service (unsafe-to-monitor): Demonstrate that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with Subsection I.1, as specified in Subsection I.5.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection I.1.
- Comply with the test methods and procedures in Section P, as specified in Subsections P.1 through P.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 21 [LAC 33:III.5109.A]
- 22 [LAC 33:III.5109.A]
- 23 [LAC 33:III.5109.A]
- 24 [LAC 33:III.5109.A]
- 25 [LAC 33:III.5109.A]
- 26 [LAC 33:III.5109.A]
- 27 [LAC 33:III.5109.A]

SPECIFIC REQUIREMENTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
 Activity Number: PER20080038
 Permit Number: 2573-V5
 Air - Title V Regular Permit Minor Mod

FUG 0015 UZ - Fugitive Emissions

- 28 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (skip period leak detection and repair): Notify DEQ 30 days before implementing any of the alternate provisions of Section J, as specified in Subsection R.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 29 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating the monitoring personnel more than two meters above a support service, as specified in Subsection I.6.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection I.I.
- 30 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (percent leaking valves ≥ 4): VOC, Total monitored by the regulation's specified method(s) monthly, as specified in Subsection I.7 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. Initiate monthly monitoring within 60 days of the previous monitoring and continue until the percent of leaking valves is less than 4, at which time monitoring can be performed in accordance with Subsection I.I.
- 31 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Sampling connection systems (closed-purge or closed vent system): Return the purged process fluid directly to the process line with zero VOTAP emissions to the atmosphere, or collect and recycle the purged process fluid with zero VOTAP emissions to the atmosphere, or be designed and operated to capture and transport all the purged process fluid to a control device that complies with the requirements of Section N, as specified in Subsection G.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 32 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (inaccessible or glass or glass-lined): Repair leaks as soon as practicable, but no later than 15 calendar days after detecting a leak by visual, audible, olfactory or other means, except as specified in Subsection O.8, as specified in Subsection O.11.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after the leak is detected, as specified in Subsection O.11.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the monitoring requirements of Subsection O.2 through O.6 and the recordkeeping and reporting requirements.
- 33 [LAC 33:III.5109.A] Pumps in light liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection D.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- 34 [LAC 33:III.5109.A] Pressure relief device in gas/vapor service: After each pressure release, return to a condition of no leakage, as indicated by an instrument reading of less than 500 ppm, as soon as practicable, but no later than five calendar days after each pressure release, except as provided in Section M, as specified in Section F.2.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 35 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (unsafe-to-monitor): Determine that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with Subsections O.2 through O.6, as specified in Subsection O.10.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection O.2 through O.6.
- 36 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (percent of leaking connectors ≤ 2): VOC, Total monitored by the regulation's specified method(s) annually, as specified in Subsections O.2 and O.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitoring must be performed within one year from the previous monitoring. Monitor using the method specified in Section P. If an instrument reading ≥ 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
 Activity Number: PER20080038
 Permit Number: 2573-V5
 Air - Title V Regular Permit Minor Mod

FUG_0015 UZ - Fugitive Emissions

- 37 [LAC 33:III.5109.A] Compressors: Equip with a seal system that includes a barrier fluid system and that prevents leakage of process fluid to the atmosphere, except as provided for in Subsections C.4, E.9 and E.10, as specified in Subsection E.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 38 [LAC 33:III.5109.A] Sampling connection systems: Equip with a closed-purge system or closed-vent system, except as provided for in Section C, as specified in Subsection G.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Ensure that this system collects or captures the sample purge for return to the process.
- 39 [LAC 33:III.5109.A] Connectors in gas/vapor service and in liquid service (welded completely around the circumference of the interface or physically removed and the pipe welded together): Equipment/operational data monitored by the regulation's specified method(s) within three months after being welded. Check the integrity of the weld by monitoring according to the procedures in Section P or by testing using x-ray, acoustic monitoring, hydrotesting, or other applicable method, as specified in Subsection O.7 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirement in Subsection O.
- 40 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Pumps in light liquid service (dual mechanical seal system): Equip each barrier fluid system with a sensor that will detect failure of the seal system, the barrier fluid system, or both, as specified in Paragraph D.4.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- 41 [LAC 33:III.5109.A] Compressors (seal system): VOC, Total monitored by the regulation's specified method(s) quarterly, as specified in Subsection E.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor to detect leaks using the methods specified in Section P. If an instrument reading of 5000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection E.8.
- 42 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Compressors: Ensure that the barrier fluid is not in VOTAP service and, if the compressor is covered by a standard under NSPS, is not in VOC service, as specified in Subsection E.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 43 [LAC 33:III.5109.A] VOC, Total monitored by technically sound method within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled to determine if it is leaking, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 44 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Delay of Repair: Repair equipment before the end of the next process unit shutdown, if repair is technically infeasible without a process unit shutdown, as specified in Subsection M.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 45 [LAC 33:III.5109.A] Pumps in light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar), as specified in Paragraph D.1.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, monitor within 5 days by the methods specified in Subsection P.2.
- 46 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar), as specified in Paragraph D.4.d of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.

SPECIFIC REQUIREMENTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
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 Air - Title V Regular Permit Minor Mod

FUG 0015 UZ - Fugitive Emissions

- 47 [LAC 33.III.5109.A] Pumps in light liquid service (dual mechanical seal system): Equipment/operational data monitored by visual inspection/determination daily. Check sensor daily or equip with an audible alarm, as specified in Subparagraph D.4.c.i of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined in Paragraph D.4.e.ii, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service and in light liquid service: Repair leaks as soon as practicable, but no later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection I.3 and I.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- 48 [LAC 33.III.5109.A] Valves in gas/vapor service and in light liquid service: VOC. Total monitored by the regulation's specified method(s) quarterly, as specified in Subsection I.1 of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Subsection P.2. If an instrument reading of 1000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection I.3.
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service and in light liquid service (percent leaking valves \leq 2 for two consecutive semiannual leak detection periods): VOC, Total monitored by the regulation's specified method(s) annually, as specified in Paragraph J.2.b of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Section P. If the percentage of valves leaking is greater than 2 for any monitoring period, comply with the requirements as described in Section I, as specified in Paragraph J.2.c of the Louisiana MACT Determination for Refinery Equipment Leaks (July 26, 1994). Optional alternative to quarterly monitoring.
- 49 [LAC 33.III.5109.A] Which Months: All Year Statistical Basis: None specified
- Pumps in light liquid service (unmanned plant site): Presence of a leak monitored by visual inspection/determination at the regulation's specified frequency, as specified in Subparagraph D.6 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor pump as often as practicable and at least monthly. Comply with this requirement instead of the weekly visual inspection requirements in Paragraphs D.1.b and D.4.d, and the daily requirements in Paragraph D.4.e.i.
- 50 [LAC 33.III.5109.A] Which Months: All Year Statistical Basis: None specified
- Compressors: Equip each barrier fluid system as described in Subsections E.2 through E.4 with a sensor that will detect failure of the seal system, the barrier fluid system, or both, as specified in Subsection E.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 51 [LAC 33.III.5109.A] Shall control emissions to a degree that constitutes Maximum Achievable Control Technology (MACT). Shall conduct an LDAR program which meets requirements of Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995) - Determined as MACT.
- 52 [LAC 33.III.5109.A] Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure, or equip with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device that complies with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emissions to the atmosphere, as specified in Paragraph D.4.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- 53 [LAC 33.III.5109.A]
- 54 [LAC 33.III.5109.A]

SPECIFIC REQUIREMENTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
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 Permit Number: 2573-V5
 Air - Title V Regular Permit Minor Mod

FUG 0015 UZ - Fugitive Emissions

- 55 [LAC 33:III.5109.A] Compressors: Equipment/operational data monitored by technically sound method daily, as specified in Paragraph E.6.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Check each sensor as required in Subsection E.5 daily or equip with an audible alarm unless the compressor is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on criterion determined under Paragraph E.6.b, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection E.8.
- Which Months: All Year Statistical Basis: None specified Valves in gas/vapor service and in liquid service (difficult-to-monitor): VOC, Total monitored by the regulation's specified method(s) at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valve at least once per calendar year, as specified in Subsection I.6.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. Comply with this requirement instead of the requirements in Subsection I.1.
- Which Months: All Year Statistical Basis: None specified Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in VOTAP service and, if the pump is covered by standards under NSPS, is not in VOC service, as specified in Paragraph D.4.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both, as specified in Subparagraph D.4.e.ii of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- Valves in gas/vapor service and in liquid service (unsafe-to-monitor): VOC, Total monitored by the regulation's specified method(s) at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times, as specified in Subsection I.5.b of the Louisiana MACT Determination for Refinery Equipment Leaks (July 26, 1994). Monitor using the method specified in Subsection P.2. Comply with this requirement instead of the requirements in Subsection I.1.
- Which Months: All Year Statistical Basis: None specified Open-ended valves or lines (equipped with a second valve): Operate in a manner such that the valve on the process fluid end is closed before the second valve is closed, as specified in Subsection H.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection K.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- Surge control vessels and bottoms receivers: Equip each surge control vessel and bottoms receiver that is not routed back to the process with a closed-vent system that routes the organic vapors vented from the vessel back to the process or to a control device that complies with the requirements of Section N or to an alternate method of control which has been approved by DEQ, as specified in Section L of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 61 [LAC 33:III.5109.A] VOC, Total recordkeeping by logbook within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled. Maintain records as required in Subsection Q.5, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 62 [LAC 33:III.5109.A]
- 63 [LAC 33:III.5109.A]

SPECIFIC REQUIREMENTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
 Activity Number: PER20080038
 Permit Number: 2573-V5
 Air - Title V Regular Permit Minor Mod

FUG 0015 UZ - Fugitive Emissions

- 64 [LAC 33:III.5109.A] Compressors (seal system): Operate with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure, or equip with a barrier fluid system that is connected by a closed-vent system to a control device that complies with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emission to the atmosphere, as specified in Subsection E.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 65 [LAC 33:III.5109.A] Pressure relief device in gas/vapor service: VOC, Total < 500 ppm except during pressure releases, as measured by the method specified in Section P.3, as specified in Section F.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 66 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service and in light liquid service: VOC, Total monitored by the regulation's specified method(s) once initially, as specified in Subsections O.1 and O.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If an instrument reading ≥ 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
- 67 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service and in light liquid service (≤ 1 inch in diameter): Comply with the requirements of Section K, as specified in Paragraph O.8.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Paragraph O.2.
- 68 [LAC 33:III.5109.A] Attach a weatherproof and readily visible identification, marked with the equipment identification, to leaking equipment, as specified in Subsection Q.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 69 [LAC 33:III.5109.A] Pressure relief device in gas/vapor service: VOC, Total monitored by the regulation's specified method(s) within 5 days (calendar) after the pressure release to confirm the condition of no leakage, as indicated by an instrument reading of less than 500 ppm above background, as specified in Section F.2.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.3.
- 70 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Compressors: Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both, as specified in Paragraph E.6.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 71 [LAC 33:III.5109.A] Pumps in light liquid service: VOC, Total monitored by the regulation's specified method(s) quarterly. Monitor to detect leaks using the methods specified in Subsection P.2, except as provided in Subsection C.4 and Subsections D.4, D.5, and D.6, as specified in Paragraph D.1.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If an instrument reading of 2000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate repair provisions as specified in Subsection D.3.
- 72 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Compressors: Equip with a closed-vent system capable of capturing and transporting any leakage from the seal to a control device that complies with the requirements of Section N, except as provided for in Subsection E.10, as specified in Paragraph E.9 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Alternative to Subsections E.1 through E.7.

SPECIFIC REQUIREMENTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
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FUG 0015 UZ - Fugitive Emissions

- 73 [LAC 33:III.5|09.A] Connectors in gas/vapor service and in liquid service (opened or otherwise had the seal broken): VOC, Total monitored by the regulation's specified method(s) within 90 days after being returned to VOTAP service. Monitor each connector that has been opened or has otherwise had the seal broken, including those determined to be unrepairable prior to process unit shutdown, as specified in Paragraph O.8.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If the follow-up monitoring detects a leak, initiate repair provisions specified in Subsection O.9, unless it is determined to be unrepairable, in which case it is counted as unrepairable.
- Which Months: All Year Statistical Basis: None specified
- Identify each piece of equipment in a process unit subject to this MACT determination such that it can be distinguished readily from equipment that is not subject to this MACT determination, as specified in Subsection C.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 74 [LAC 33:III.5|09.A] Compressors: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection E.8 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- 75 [LAC 33:III.5|09.A] Valves in gas/vapor service and in liquid service (percent leaking valves ≤ 2 for two consecutive quarterly leak detection periods): VOC, Total monitored by the regulation's specified method(s) semiannually, as specified in Paragraph J.2.a of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Section P. If the percentage of valves leaking is greater than 2% for any monitoring period, comply with the requirements as described in Section I, as specified in Paragraph J.2.c of the Louisiana MACT Determination for Refinery Equipment Leaks (July 26, 1994). Optional alternative to quarterly monitoring.
- Which Months: All Year Statistical Basis: None specified
- Pumps in liquid service: Equip with a closed vent system capable of capturing and transporting any leakage from the seal or seals to a control device that complies with the requirements of Section N, as specified in Paragraph D.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Alternative to Subsections D.1 through D.4.
- 76 [LAC 33:III.5|09.A] Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve that seals the open end at all times except during operations requiring process fluid flow through the open-ended valve or line or during maintenance and repair, as specified in Subsection H.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 77 [LAC 33:III.5|09.A] Compressors (no detectable emissions): Demonstrate that the compressor is operating with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in Subsection P.3, as specified in Paragraph E.10.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsections E.2 through E.9.
- 78 [LAC 33:III.5|09.A] Open-ended valves or lines: Monitor and repair in accordance with Section I, as specified in Subsection H.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 79 [LAC 33:III.5|09.A] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in Subsections Q.1 through Q.13 as applicable, as specified in Section Q of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 80 [LAC 33:III.5|09.A]
- 81 [LAC 33:III.5|09.A]

GRP 0082 - T0 - Mix Tanks and Brine Tanks Cap

SPECIFIC REQUIREMENTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
Activity Number: PER20080038
Permit Number: 2573-V5
Air - Title V Regular Permit Minor Mod

GRP 0082 - T0 - Mix Tanks and Brine Tanks Cap**Group Members:** EQT 0645EQT 0646EQT 0650EQT 0651EQT 0652EQT 0653EQT 0654EQT 0655

- 82 [LAC 33:III 501.C.6] VOC, Total <= 9.21 tons/yr. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if total VOC exceeds the maximum listed in this specific condition for any twelve consecutive month period.
 Which Months: All Year Statistical Basis: Twelve-consecutive-month maximum
 VOC, Total monitored by technically sound method monthly.
- 83 [LAC 33:III 501.C.6] Which Months: All Year Statistical Basis: Twelve-consecutive-month maximum
 VOC, Total Submit report: Due annually, by the 31st of March. Report the total VOC for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.
- 84 [LAC 33:III 501.C.6] VOC, Total recordkeeping by electronic or hard copy monthly. Keep records of the total VOC each month, as well as the total VOC for the last twelve months. Make records available for inspection by DEQ personnel.

GRP 0083 - U0 - Hydrogen Vent Stacks Cap**Group Members:** EQT 0626EQT 0627EQT 0628EQT 0629EQT 0630EQT 0631EQT 0632EQT 0633EQT 0634EQT 0635

- 86 [LAC 33:III 501.C.6] VOC, Total <= 0.73 tons/yr. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if total VOC exceeds the maximum listed in this specific condition for any twelve consecutive month period.
 Which Months: All Year Statistical Basis: Twelve-consecutive-month maximum
 VOC, Total recordkeeping by electronic or hard copy monthly. Keep records of the total VOC each month, as well as the total VOC for the last twelve months. Make records available for inspection by DEQ personnel.
- 87 [LAC 33:III 501.C.6] VOC, Total monitored by technically sound method monthly.
- 88 [LAC 33:III 501.C.6] Which Months: All Year Statistical Basis: Twelve-consecutive-month maximum
 VOC, Total Submit report: Due annually, by the 31st of March. Report the total VOC for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.

UNF 0006 - Chlorine/Cell Service Plant

- 90 [40 CFR 61.145] Shall comply with all applicable provisions of 40 CFR 61.145(b), 61.145(c), and 61.150.
 All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
- 91 [40 CFR 61] Comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B.
- 92 [40 CFR 82.Subpart F] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 93 [LAC 33:III 219]

SPECIFIC REQUIREMENTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
 Activity Number: PER20080038
 Permit Number: 2573-V5
 Air - Title V Regular Permit Minor Mod.

UNF 0006 - Chlorine/Cell Service Plant

- 94 [LAC 33:III.501.C.6] Maintain best practical housekeeping and maintenance practices at the highest possible standards to control emissions of highly reactive volatile organic compounds (HRVOC), which include 1,3-Butadiene, Buene, cis-2-Butene, trans-2-Butene, Ethylene, Propylene, Toluene, Xylene, m/p-Xylene, o-Xylene. (State Only).
- 95 [LAC 33:III.501.C.6] Maintain, to the extent practicable, a leak-free facility taking such steps as are necessary and reasonable to prevent leaks and to expeditiously repair leaks that occur. Update the written plan presently required by LAC 33:III.2113.A.4 within 30 days of receipt of this permit to incorporate these general duty obligations into the housekeeping procedures. The plan shall then be considered a means of emission control subject to the required use and maintenance provisions of LAC 33:III.905. Failure to develop, use, and diligently maintain the plan shall be a violation of this permit. (State Only).
- 96 [LAC 33:III.507.E.4] Any permit application to renew an existing permit shall be submitted at least six months prior to the date of permit expiration, or at such earlier time as may be required by the existing permit or approved by the permitting authority. In no event shall the application for permit renewal be submitted more than 18 months before the date of permit expiration.
- 97 [LAC 33:III.5105.A.1] Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.
- 98 [LAC 33:III.5105.A.2] Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109.
- 99 [LAC 33:III.5105.A.3] Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 100 [LAC 33:III.5105.A.4] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.
- 101 [LAC 33:III.5107.A.2] Submit Annual Emissions Report (TED): Due annually, by the 1st of July, to the Office of Environmental Assessment, Air Quality Assessment Division, in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- 102 [LAC 33:III.5107.A.3] Include a certification statement with initial and subsequent annual emission reports and revisions to any emission report to attest that the information contained in the emission report is true, accurate, and complete, and signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official. The certification statement shall read: "I certify, under penalty of perjury, that the emissions data provided is accurate to the best of my knowledge, information, and belief, and I understand that submitting false or misleading information will expose me to prosecution under state regulations."
- 103 [LAC 33:III.5107.B.1] Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but no later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere which results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- 104 [LAC 33:III.5107.B.2] Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC), except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:1.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:1.3923.

SPECIFIC REQUIREMENTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
 Activity Number: PER20080038
 Permit Number: 2573-V5
 Air - Title V Regular Permit Minor Mod

UNF 006 - Chlorine/Cell Service Plant

- 105 [LAC 33:III.5107.B.3] Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services, SPOC, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:III.3931, except as provided in LAC 33:III.5107.B.6. Submit notification in the manner provided in LAC 33:III.3923.
- 106 [LAC 33:III.5107.B.4] Submit written report: Due within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through 3. Submit report to the Office of Environmental Compliance by certified mail. Include the information specified in LAC 33:III.5107.B.4.i through viii.
- 107 [LAC 33:III.5107.B.5] Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, in the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 108 [LAC 33:III.5109.B.3] Achieve compliance with ambient air standards unless it can be demonstrated to the satisfaction of DEQ that compliance with an ambient air standard would be economically infeasible; that emissions could not reasonably be expected to pose a threat to public health or the environment; and that emissions would be controlled to a level that is Maximum Achievable Control Technology.
- 109 [LAC 33:III.5109.B] Determine the status of compliance, beyond the property line, with applicable ambient air standards listed in LAC 33:III.5112. Table 51.2.
- 110 [LAC 33:III.511.A] Do not commence construction or modification of any major source without first obtaining written authorization from DEQ, as specified.
- 111 [LAC 33:III.5113.A.1] Submit notification in writing. Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC, not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.
- 112 [LAC 33:III.5113.A.2] Submit notification in writing. Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC, within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.
- 113 [LAC 33:III.511] Submit notification: Due to the permitting authority prior to the initiation of any project which will result in emission reductions. Include in the notification a description of the proposed action, a location map, a description of the composition of air contaminants involved, the rate and temperature of the emissions, the identity of the sources involved and the change in emissions. Make any appropriate permit revision reflecting the emission reduction no later than 180 days after commencement of operation and in accordance with the procedures of LAC 33:III. Chapter 5.
- 114 [LAC 33:III.511.E] Shall comply all applicable requirements of LAC 33:III.5151.E.
- 115 [LAC 33:III.517.A.1] Submit permit application: Due prior to commencement of construction, reconstruction, or modification of the source, for new or modified sources. Do not commence construction, reconstruction, or modification of any source required to be permitted under LAC 33:III. Chapter 5 prior to approval by the permitting authority.
- 116 [LAC 33:III.517.A.2] Submit permit application: Due by the date established for submittal in accordance with LAC 33:III.507.C. The permit application is for an initial permit to be issued in accordance with LAC 33:III.507. Provide a copy of each permit application pertaining to a major Part 70 source to EPA at the time of application submittal to the permitting authority.
- 117 [LAC 33:III.517.B.1] Any application form, report, or compliance certification submitted under this Chapter shall contain certification by a responsible official of truth, accuracy, and completeness. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the application are true, accurate, and complete.

SPECIFIC REQUIREMENTS

AI ID: 1409 - The Dow Chemical Co - Louisiana Operations
Activity Number: PER20080038
Permit Number: 2573-V5
Air - Title V Regular Permit Minor Mod

UNF 0006 - Chlorine/Cell Service Plant

- 118 [LAC 33:III.517.C] Submit supplementary facts or corrected information: Due promptly upon becoming aware of failure to submit or incorrect submittal regarding permit applications. In addition, provide information as necessary to address any requirements that become applicable to the source after the date of filing a complete application but prior to release of a proposed permit.
- 119 [LAC 33:III.517.D] Submit applications for permits in accordance with forms and guidance provided by the DEQ. At a minimum, each permit application submitted under LAC 33:II Chapter 5 shall contain the information specified in LAC 33:III.517.D, subparagraphs 1-18.
- 120 [LAC 33:III.517.E] In addition to those elements listed under LAC 33:III.517.D, include in each application pertaining to a Part 70 source the information specified in LAC 33:III.517.E, Subparagraphs 1-8.
- 121 [LAC 33:III.5609.A.1.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 5 when the administrative authority declares an Air Pollution Alert.
- 122 [LAC 33:III.5609.A.2.b] Activate the preplanned strategy listed in LAC 33:III.5611. Table 6 when the administrative authority declares an Air Pollution Warning.
- 123 [LAC 33:III.517.B] Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 7 when the administrative authority declares an Air Pollution Emergency.
- 124 [LAC 33:III.5609.A] Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency. Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611. Tables 5, 6, and 7.
- 125 [LAC 33:III.5901.A] Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
- 126 [LAC 33:III.5907] Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.
- 127 [LAC 33:III.5911.A] Submit registration: Due January 31, 1998, or within 60 days after the source becomes subject to LAC 33:III. Chapter 59, whichever is later. Include the information listed in LAC 33:III.5911.B, and submit to the Department of Environmental Quality, Office of Environmental Compliance, Emergency and Radiological Services Division.
- 128 [LAC 33:III.5911.C] Submit amended registration: Due to the Department of Environmental Quality, Office of Environmental Compliance, Emergency and Radiological Services Division, within 60 days after the information in the submitted registration is no longer accurate.
- 129 [LAC 33:III.919.D] Submit Emission Inventory (E) Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Air Quality Assessment Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.